

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUMEAL CAMPBELL, A.K.A. "MELO,"

and

Defendants.

Case No. 24-CR-
[18 U.S.C. §§ 2(a), 922(g), 924(a)(2),
924(c)(1)(A)(ii), 924(a)(2), 924(a)(8), &
1951(a)]

SEALED

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CLERK OF COURT

24-CR-101

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Beginning in or about December 2021, and continuing through on or about December 5, 2022, in the State and Eastern District of Wisconsin and the State and Northern District of Illinois,

RUMEAL CAMPBELL, A.K.A. "MELO,"

and

knowingly conspired with others, known and unknown to the grand jury, to unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by committing the offense of robbery, in that the defendants conspired to unlawfully take and obtain U.S. currency and commodities from employees of commercial businesses against their will by means of actual and threatened force, violence, and fear of injury.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, Family Dollar, located at 6000 West Silver Spring Drive, in Milwaukee Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about January 30, 2022, in the State and Eastern District of Wisconsin,

RUMEAL CAMPBELL, A.K.A. "MELO," and


did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendants did unlawfully take and obtain U.S. currency and commodities from employees of Family Dollar, against their will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Sections 1951(a) and 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2022, in the State and Eastern District of Wisconsin,

RUMEAL CAMPBELL, A.K.A. "MELO," and


knowingly used, carried, brandished, and discharged a firearm during and in relation to a crime of violence, namely robbery, as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a).


COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, BP Gas Station, located at 7920 West National Avenue, in West Allis, Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about January 30, 2022, in the State and Eastern District of Wisconsin,

RUMEAL CAMPBELL, A.K.A. "MELO," and



did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendants did unlawfully take and obtain U.S. currency and commodities from employees of Family Dollar, against their will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Sections 1951(a) and 2(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2022, in the State and Eastern District of Wisconsin,

RUMEAL CAMPBELL, A.K.A. "MELO," and



knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, namely robbery, as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about January 30, 2022, in the State and Eastern District of Wisconsin,

RUMEAL CAMPBELL, A.K.A. "MELO,"

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Springfield XD .40 caliber firearm, bearing serial number XD500224.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, 7-ELEVEN, located at 3301 North Oakland Avenue, in Milwaukee, Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about December 5, 2022, in the State and Eastern District of Wisconsin,



did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendants did unlawfully take and obtain U.S. currency and commodities from employees of 7-ELEVEN, against their will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Sections 1951(a) and 2(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 5, 2022, in the State and Eastern District of Wisconsin,



knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, namely robbery, as charged in Count Seven of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 5, 2022, in the State and Eastern District of Wisconsin,



knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Smith and Wesson, Model MP pistol, bearing serial number HKS110.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 5, 2022, in the State and Eastern District of Wisconsin,



knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Kahr CT45 handgun, bearing serial number AKA0061.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

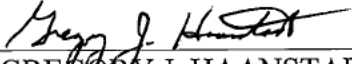
FORFEITURE NOTICE

1. Upon conviction of one or more of the Hobbs Act offenses, in violation of 18 U.S.C. § 1951, as charged in Counts Two, Four, and Seven of this Indictment, the defendants shall forfeit to the United States of America, under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property includes, but is not limited to, the amount of proceeds that the defendants obtained from these offenses.

2. If any of the property described above, as a result of any act or omission by the defendants: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the Court's jurisdiction; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

FOREPERSON

Dated: 14 May 2024


GREGORY J. HAANSTAD
United States Attorney